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June 14, 2022

Via ECFI

The Honorable John G. Koeltl
United States District Judge
500 Pearl Street
United States Courthouse, Courtroom 14A
New York, NY 10007

Re: *Grant et al. v. Trump et al.*, Case No. 1:20-cv-07103-JGK

Dear Judge Koeltl:

This firm represents plaintiffs Edmond Grant p/k/a “Eddy Grant”, Greenheart Music Limited, a United Kingdom Limited Company, and Greenheart Music Limited, an Antigua and Barbuda Limited Company in the above-referenced action. We write with consent from defendants Donald J. Trump and Donald J. Trump For President, Inc. and pursuant to Your Honor’s Individual Practices Rule I.E. to request a 30 day extension of the fact discovery end date currently scheduled for June 21, 2022. The extension is necessary for Plaintiff to complete a deposition of a corporate representative of Donald J. Trump For President, Inc. pursuant to Federal Rule of Civil Procedure 30(b)(6). The other parties have already been deposed but Defendants will not be able to produce a 30(b)(6) witness by the current fact discovery end date. This is the parties’ second request for an extension of the discovery schedule. The first request was granted on March 31, 2022 (the “Revised Scheduling Order,” ECF No. 65). The requested extension will not affect other scheduled dates in the Case Management Plan dated November 3, 2021 (ECF No. 55) or the Revised Scheduling Order. The parties respectfully request that the Court so order the requested extension in this letter motion if it finds the same acceptable.

We thank the Court for its attention to this matter.

Respectfully submitted,

s/ Brett Van Benthysen
Brett Van Benthysen

Encl.

cc: Counsel of Record

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